

REMARKS

I. Status

In the Office Action mailed June 30, 2003, the Examiner noted that claims 1-7 were pending and rejected claims 1-7. Claims 1-6 have been amended, Thus, in view of the foregoing, claims 1-7 remain pending for reconsideration, which is requested. No new matter has been added. The applicants respectfully traverses the rejection.

II. Oath/Declaration

The applicants respectfully requests that the applicants be permitted to submit a supplemental declaration after allowance which will also include the correction noted by the Examiner.

III. Specification

The informalities objected to have been corrected, except for the page numbers 16a-16l and pages 24a, 24b. The CFR and MPEP, particularly the relevant sections 37 CFR 1.71 and MPEP 608.01 does not specify a numerical system for numbering pages. Since the sequence of the specification is clear from the present numbering system, and changing it now would result in significant expense and confusion, the applicants requests that this objection be dropped.

The Examiner requested detailed support for claims 1-10. FIGs 11, 12, and 13 illustrate an overview of one possible example of the apparatus and method of claims 1-10. A display mechanism is shown in FIG. 13. Components of the decoding process are illustrate in FIG. 11. Support for tokens starts on page 51, and on page 104, line 23 to page 108, line 29. Support for the "formatter" is on page 134, line 9 to page 135, line 27.

Further information of the structure and operation of the invention of claims 1-11 is given in an illustrative embodiment of the invention which is set forth in sections 1-27 (see page 84, line 30 to page 85, line 22). Components of the decoding process are illustrated, such as the Inverse Modeler 23 (page 146, lines 20-31), Inverse Quantizer 24 (page 146, line 33 to page 147, line 28), Huffman Decoder and Parser 25 (page 147, line 19 to page 151, line 12), and Diverse Discrete Cosine Transformer 26 (page 151, line 13 to page 152, line 5).

The Specification discloses the inverse modeller in section 23 on page 146, lines 20-31 and Section B.5 on pages 476 – 483.

IV. Information Disclosure Statement

The documents requested by the Examiner are enclosed herein.

V. Double Patenting

The Applicants submits a Terminal Disclaimer for the purpose of overcoming the double patenting rejection of U.S. Patent 6,038,380. However, Applicants do not admit to any characterization or limitation of the claims by the Examiner, particularly any that are inconsistent with the language of the claims considered in their entirety and including all of their constituent limitations.

VI. Rejection of claims under 35 U.S.C. § 112, second paragraph

The applicants requests that the Examiner withdraw rejection of claims 1-7, as amended.

VII. Rejection of claims under 35 U.S.C. § 102

Claims 1-4 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Horvath et al.

To support the allegation that Horvath et al. discloses receiving a sequence of data words of a predetermined width, the Office Action cites to

column 1, lines 15-25 and lines 37-41 and column 9, lines 32-34 of Horvath et al. However, the Applicants respectfully submits that these sections do not disclose receiving "data words". But rather, these sections refer to processing "blocks of data".

To support the allegation that Horvath et al. discloses "different respective format", the Office Action cites to column 1, lines 33-37 and column 10, lines 20-37 of Horvath et al. However, the Applicants respectfully submits that these sections do not disclose this feature as recited in claim 1. Column 1, lines 33-37 describes in the Background of the Invention that both JPEG and MPEG have a discrete cosine transform. However, this section does not describe a method of receiving data words having "different respective formats" (claim 1, lines 2-3). Column 10, lines 20-37 of Horvath et al. appears to only refer to a decoding function of an MPEG decoder. Thus, neither sections disclose the present invention "receiving a sequence of data words of a first predetermined width and different respective formats" (claim 1, lines 2-3).

To support the allegation that Horvath et al. discloses splitting the data words of the received sequence to form new data words of a new sequence, the Office Action cites to column 6, line 63- column 7, line 3 and column 7, line 62 – column 8, line 2 of Horvath et al. However, the Applicants respectfully submits that these sections do not disclose these features. Column 6, line 63 – column 7, line 3 discloses a function composing blocks of RLC image data. Column 7, line 62 – column 8, line 2 merely refers to blocks of image data. Thus, neither sections disclose "splitting the data words of the received sequence to form new data words of a new sequence" (claim 1, lines 4-5).

To support the allegation that Horvath et al. discloses packing the consecutive new data words consecutively in a token buffer of a second width without holes between the packed new data words, the Office Action cites to column 8, lines 3-24 of Horvath et al. However, the Applicants respectfully submits that these sections do not disclose these features. Column 8, lines 3-24 refer to a function of producing 64 coefficients per data block which is

unrelated to "packing the consecutive new data words consecutively in a token buffer of a second width without holes between the packed new data words" (claim 1, lines 6-7).

To support the allegation that Horvath et al. discloses unpacking data words to reproduce the new sequence of data words, the Office Action cites to claim 14 of Horvath et al. However, the Applicants respectfully submits that these sections do not disclose this feature. But rather, claim 14 discloses a means for encoding and decoding (CODEC) blocks of image data. Claim 14 does not disclose "unpacking the data words to reproduce the new sequence of new data words" (claim 1, line 8).

As for claim 2, column 8, lines 11-14 and column 13, lines 17-18 discloses an "image buffer" but does not disclose a "token buffer" as recited in claim 1. The cited prior art does not disclose "data tokens" or "tokens" or a "token buffer" (claim 1, line 6) as cited in claims 1-7. A "token" of the present invention is defined in the specification as "interactive interfacing messenger package for control and for data functions." (page 24b, lines 11-13). This entails a technology more powerful than a traditional token, for example, in the context of token rings, or a traditional packet of information. Horvath et al. does not disclose this technology.

As for claim 3, although column 6, lines 6-9 and column 7, lines 3-6 discloses run length coding, these sections do not disclose "expanding out run length code in the unpacked words" (claim 3).

As for claim 4, to support the allegation that Horvath et al. discloses a data unpacker to unpack data words received from an input terminal to a different length format, the Office Action cites to column 6, line 63- column 7, line 3 and column 7, line 62 – column 8, line 2 of Horvath et al. However, the Applicants respectfully submits that these sections do not disclose these features. Column 6, line 63 – column 7, line 3 discloses a function composing blocks of RLC image data. Column 7, line 62 – column 8, line 2 merely refers to blocks of image data. Thus, neither sections disclose "a data unpacker to

unpack data words received from an input terminal to a different length format" (claim 4, lines 2-3). Furthermore, column 8, lines 3-24 refer to a function of producing 64 coefficients per data block. Column 4, lines 10-12 mentions that a stream of DCT coefficients frequently contain long runs of zeros. Thus, neither section discloses the "data expander" nor "data padder" of claim 4.

Therefore, the present invention recited in claims 1-4 is not rendered obvious by the cited prior art.

VIII. Rejection of claims under 35 U.S.C. § 103(a)

Claims 5-7 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Horvath et al. in view of Morrison et al.

As for claim 5, the Office Action admits that Horvath et al. does not disclose the data expander expanding out run length codes into runs of zero followed by a level in the packed data. However, the Office Action alleges that column 7, lines 40-54 of Morrison et al. does. Although the cited section of Morrison et al. discloses a run length code, it does not disclose "a data expander" expanding out the run length codes as recited in claim 5.

Thus, neither of the references Horvath et al. nor Normile et al. separately, or in combination, have disclosed the above features of claims 5-7.

Column 2, lines 32-35 and column 4, lines 13-15 of Morrison et al. do not show a "data padder" as recited in claim 6. Column 5, lines 1-47 of Morrison et al. discloses processing of a group of data blocks and does not show the "data unpacker" recited in claim 7.

Therefore, the present invention recited in claims 5-7 is not rendered obvious by the cited prior art.

IX. Concluding Matters

In view of the foregoing amendments and remarks, it is respectfully submitted that each of the claims distinguishes over the prior art, and therefore,

defines allowable subject matter. A prompt and favorable reconsideration of the rejection along with an indication of allowance of all the pending claims is respectfully requested.

Should there be any remaining questions to correct format matters, it is urged that the Examiner contact the undersigned attorney with a telephone interview to expedite and complete prosecution.

If any further fees are required in connection with the filing of this response, please change same to our Deposit Account No. 04-1175.

Respectfully submitted,

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